

**SNMP RESEARCH, INC. and SNMP  
RESEARCH INTERNATIONAL, INC.,**

**V.**

**Broadcom Inc.**  
**Brocade Communications Systems LLC**  
**Extreme Networks, Inc.**

## Defendants.

## Jury Trial Demanded

Come now Plaintiffs SNMP Research, Inc. and SNMP Research International, Inc. (collectively “Plaintiffs”), by and through counsel, and pursuant to Fed. R. Civ. P. 5.2 and Local Rule 26.2(b) of this Court, and this Court’s Memorandum and Order Regarding Sealing Confidential Information [Doc. 11], request that this Court seal portions of Doc. 154 for the reasons indicated below.

On July 22, 2022 Plaintiffs filed Plaintiffs’ Evidentiary Supplement Pursuant to Docket 147 (“Plaintiffs’ Supplement”) (Doc. 154). Plaintiffs’ Supplement identifies a valuation related to the sale of Brocade’s Data Center business to Extreme and the names of some Tennessee entities which were obtained from documents Defendants marked Outside Counsel Eyes Only and Highly Confidential pursuant to the protective order entered in this case (Doc. 93). Plaintiffs inadvertently failed to redact the information. Plaintiffs have conferred with Defendants and Defendants desire that the information be redacted. Thus, Defendants desire an opportunity to respond to a motion to seal with argument on why the information should be filed under seal.

Plaintiffs respectfully request that Document 154 be removed and replaced with the redacted version attached as Exhibit A. Plaintiffs will submit the unredacted version in a separate motion to seal with redacted information highlighted which Defendants can respond to within fourteen days.

**Respectfully submitted this 25<sup>th</sup> day of July, 2022.**

/s/ John L. Wood

John L. Wood, Esq. (BPR #027642)  
Cheryl G. Rice, Esq. (BPR #021145)  
Rameen J. Nasrollahi, Esq. (BPR #033458)  
EGERTON, McAFFEE, ARMISTEAD

& DAVIS, P.C.  
900 S. Gay Street, Suite 1400  
P.O. Box 2047  
Knoxville, TN 37902  
(865) 546-0500 (phone)  
(865) 525-5293 (facsimile)  
jwood@emlaw.com  
crice@emlaw.com  
rnasrollahi@emlaw.com

Morgan Chu (CA Bar. No. 70446)  
David Nimmer (CA Bar. No. 97170)  
A. Matthew Ashley (CA Bar. No. 198235)  
Olivia L. Weber (CA Bar. No. 319918)  
IRELL & MANELLA LLP  
1800 Avenue of the Stars, Suite 900  
Los Angeles, California 90067-4276  
(310) 277-1010 (phone)  
(310) 203-7199 (facsimile)  
mchu@irell.com  
dnimmer@irell.com  
mashley@irell.com  
oweber@irell.com

*Attorneys for Plaintiffs*  
*SNMP RESEARCH INTERNATIONAL, INC. and*  
*SNMP RESEARCH, INC.*